

**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

**Settlement Date:** December 22, 2020  
**Time:** 12:00 p.m.

**Objections Due:** December 21, 2020  
**Time:** 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
for the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and for the  
Estate of Bernard L. Madoff,

Plaintiff,

v.

BAM L.P., MICHAEL MANN, AND MERYL  
MANN,

Defendants.

Adv. Pro. No. 10-04390 (CGM)

**NOTICE OF PROPOSED ORDER IMPLEMENTING JUDGMENT**

**PLEASE TAKE NOTICE** that pursuant to the Memorandum Decision Determining Funds Held in the Bank Accounts are Customer Property and Awarding Prejudgment Interest (the “Decision”) dated December 11, 2020, and in accordance with Local Bankruptcy Rule 9074-1(a), Irving H. Picard, the Trustee, through his undersigned counsel, will present the proposed judgment and the Decision, attached hereto as **Exhibits 1 and 2**, respectively, to the Honorable Cecelia G. Morris, United States Bankruptcy Judge, for settlement and signature in her chambers located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **December 22, 2020 at 12:00 pm.**

**PLEASE TAKE FURTHER NOTICE** that the Trustee provided the proposed judgment to counsel for Defendants but they do not consent to the attached proposed judgment.

**PLEASE TAKE FURTHER NOTICE** that to the extent there is a counter-proposed judgment or objection to the proposed judgment, it must be in writing and filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 by no later than December 21, 2020 at 5:00 p.m. (the “Objection Deadline”), with a courtesy copy delivered to the chambers of the Honorable Cecelia G. Morris; and served upon Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq. and Securities Investor Protection Corporation, 1667 K St. N.W., Suite 1000, Washington, D.C. 20006-1620, Attn: Kevin H. Bell, Esq. Any objection to the proposed judgment must specifically state the interest the objecting party has in these proceedings and the specific basis of any objection. Unless a counter-proposed judgment or written objection to the proposed judgment is received before the objection

deadline, the proposed judgment may be signed and entered by the Court without further notice.

Dated: December 17, 2020  
New York, New York

Respectfully Submitted,

/s/ Nicholas J. Cremona

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Lan Hoang

Email: lhoang@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff*